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Attorneys for Defendants  
General Electric Company and  
NBC Universal, Inc.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

DONE! VENTURES, LLC, a Delaware  
Limited Liability Company,

Plaintiff,

vs.

GENERAL ELECTRIC COMPANY, a  
New York Corporation; NBC  
UNIVERSAL, INC., a Delaware  
Corporation; and IVILLAGE, INC., a  
Delaware Corporation, and DOES 1  
through 10, inclusive,

Defendants.

CASE NO. CV10-4420-SJO(JCx)

The Hon. S. James Otero

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

Complaint served: June 7, 2010

Current response date: June 28, 2010

New response date: July 28, 2010

1 WHEREAS, Defendants General Electric Company and NBC Universal, Inc.  
2 removed this matter to this Court from California Superior Court on June 15, 2010;  
3 and,

4 WHEREAS, Defendant iVillage, Inc. has not yet been served; and,

5 WHEREAS, the current deadline for Defendants General Electric Company and  
6 NBC Universal, Inc. to respond to Plaintiff's complaint pursuant to Federal Rule of  
7 Civil Procedure ("FRCP") 81(c)(2) is June 28, 2010 (*i.e.*, 21 days after they were  
8 served with the state court summons and complaint on June 7, 2010); and,

9 WHEREAS, the undersigned counsel for the stipulating parties wish to extend  
10 by thirty (30) days the existing deadline for Defendants General Electric Company and  
11 NBC Universal, Inc. to answer or otherwise respond to Plaintiff's Complaint;

12 THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned  
13 counsel for the stipulating parties:

14 Pursuant to this Court's Local Rule 8-3, the time within which Defendants  
15 General Electric Company and NBC Universal, Inc. are required to answer or  
16 otherwise respond to Plaintiff's Complaint in this action shall be extended thirty (30)  
17 days (*i.e.*, from June 28, 2010 until July 28, 2010).

18  
19 Dated: June 25, 2010

BARRERA & ASSOCIATES

20 /s/ Patricio Barrera\*

21  
22 Patricio T.D. Barrera  
23 Stephen G. Svajian  
24 Barrera & Associates  
25 1500 Rosecrans Avenue, Suite 500  
26 Manhattan Beach, CA 90266  
27 Telephone: 310-802-1500  
28 Facsimile: 310-802-0500

*Attorneys for Plaintiff Done! Ventures, LLC*

1 Dated: June 25, 2010

GIBSON, DUNN & CRUTCHER LLP

2  
3 /s/ Scott Edelman\*

4 Scott A. Edelman  
5 Michael H. Dore  
6 2029 Century Park East, Suite 4000  
7 Los Angeles, CA 90067-3026  
8 Telephone: 310-552-8500  
9 Facsimile: 310-551-8741

10 *Attorneys for Defendants General Electric*  
11 *Company and NBC Universal, Inc.*

12  
13 \* I hereby attest that I have on file all holograph  
14 signatures for any signatures indicated by a  
15 "conformed" signature (/s/) within this efiled  
16 document.

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100892597 (stip. re July 28, 2010 GE/NBCU response date)

**CERTIFICATE OF SERVICE**

I, **Michael Dore**, declare as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is Gibson, Dunn & Crutcher LLP, 333 South Grand Avenue, Los Angeles, California 90071-3197, in said County and State. On June 25, 2010, I served the following document(s):

- **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)**

on the parties stated below, by placing a true copy thereof in an envelope addressed as shown below by the following means of service:

Patricio T.D. Barrera  
Stephen G. Svajian  
Barrera & Associates  
1500 Rosecrans Avenue, Suite 500  
Manhattan Beach, CA 90266

- ☒ **BY MAIL:** I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY FACSIMILE:** From facsimile number (213) 229-7520, I caused each such document to be transmitted by facsimile machine, to the parties and numbers indicated above. The facsimile machine I used complied with applicable rules and no error was reported by the machine. I caused the machine to print a transmission record of the transmission.

- 1 ☐ **BY FED EX OVERNIGHT DELIVERY:** On the above-mentioned date, I  
2 placed a true copy of the above mentioned document(s) in a sealed envelope or  
3 package designated by FEDEX with delivery fees paid or provided for, addressed  
4 to the person(s) as indicated above and deposited same in a box or other facility  
5 regularly maintained by FEDEX or delivered same to an authorized courier or  
6 driver authorized by FEDEX to receive documents.
- 7 ☒ I am employed in the office of Michael H. Dore, a member of the bar of this court,  
8 and that the foregoing document(s) was(were) printed on recycled paper.
- 9 ☒ **(FEDERAL)** I declare under penalty of perjury under the laws of the United  
10 States that the foregoing is true and correct.

11 Executed on June 25, 2010.



12 Michael Dore